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September 27, 2024

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**BY ECF**

Hon. Sarah L. Cave  
Daniel Patrick Moynihan  
United States Courthouse  
500 Pearl Street  
New York, NY 10007

Plaintiffs' request at ECF No. 381 is **GRANTED**, and Exhibit C (ECF Nos. 382-3; 383-3) to the parties' joint letter shall remain sealed.

The Clerk of Court is respectfully directed to close ECF No. 381.

SO ORDERED. September 30, 2024

  
SARAH L. CAVE  
United States Magistrate Judge

Re: *Dorce, et al. v. City of New York, et al.*, No. 1:19-cv-02216 (JLR) (SLC)

Dear Judge Cave:

Plaintiffs write concerning Exhibit C to the parties' joint letter to update the Court on the status of the fact discovery. The Transferee Defendants ("TDs") marked Exhibit C to that letter as "Confidential." Under the Confidentiality Stipulation and Protective Order, ECF No. 141, this requires Plaintiffs to file Exhibit C under seal consistent with Individual Practices of the Court. The Court's Individual Practices I(G) direct that we file a letter-motion for approval of sealed filings.

In conformance therewith, Plaintiffs respectfully submit this letter-application so as to provide TDs with an opportunity to seek to seal Exhibit C, in whole or in part. Plaintiffs do not intend to seek permanent sealing of the document, but respectfully request that the Court approve Exhibit C being provisionally filed under seal so that TDs may have an opportunity to be heard on a submission seeking permanent sealing, in whole or part, should they choose to do so.

Respectfully submitted,

**ROPES & GRAY LLP**

By: /s/ Alexander B. Simkin

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cc: Counsel of Record (via ECF)